

**NESENOFF &  
MILTENBERG** LLP

ATTORNEYS AT LAW  
nmllplaw.com

Ira S. Nesenoff  
Andrew T. Miltenberg  
Stuart Bernstein

Barbara H. Trapasso  
Ariya M. Waxman  
Tara J. Davis  
Diana R. Warshow  
Gabrielle M. Vinci  
Kara L. Gorycki  
Cindy A. Singh  
Nicholas E. Lewis  
Adrienne D. Levy

Philip A. Byler  
*Senior Litigation Counsel*  
Megan S. Goddard  
*Counsel*  
Rebecca C. Nunberg  
*Counsel*  
Jeffrey S. Berkowitz  
*Counsel*  
Marybeth Sydor  
*Title IX Consultant*

March 22, 2019

**VIA ELECTRONIC FILING**

The Honorable Sanket J. Bulsara  
Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Elliott v. Donegan, et al., Civil Case No. 1: 18-cv-05680-LDH-SJB**

Dear Magistrate Judge Bulsara,

We represent Stephen Elliott ("Plaintiff") in the above-referenced matter, and respectfully submit this letter as per the Court's March 15, 2019, directive to narrow the scope of Plaintiff's proposed subpoena to serve on Google commensurate with the scope of the amended complaint. The narrowed, proposed subpoena is attached and filed with this letter. We thank the Court and welcome the opportunity to be heard.

The undersigned further requests, if the Court is amenable, a brief adjournment of the March 26, 2019 Discovery Hearing to Friday, March 29, 2019, in the afternoon. The undersigned had a phone conversation with Ms. Roberta Kaplan, Esq., counsel for Defendant Donegan, and she has informed me that she does not oppose this request. If that date is unavailable, the parties can also appear Wednesday, March 27, 2019, after 4:00 p.m. as well.

Thank you for your courtesy and consideration.

**Very truly yours,  
NESENOFF & MILTENBERG, LLP**

**By: /s/ Nicholas E. Lewis  
Andrew T. Miltenberg, Esq.  
Nicholas E. Lewis, Esq.**

**CC: All Counsel (Via ECF)**